

RECEIVED
U.S. DISTRICT COURT
SAN JUAN, P.R.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO 2016 FEB 24 PM 12:08

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] LUIS GONZALEZ CORDOVA,
a/k/a "Luigi,"
(Counts 1-4, 6-11, 13-14)
[2] KAREN CURET NIEVES,
(Counts 1-11, 13-14)
[3] ORLANDO NEGRON BONILLA,
(Counts 1-3, 12)
[4] RUBEN ESCALERA RIVERA,
(Counts 3, 4, 9)
[5] PERFECTO DE LEON TORIBIO,
(Counts 3, 5, 10)
[6] LUIS CACERES DE LEON,
a/k/a, "Ito Bohito,"
(Counts 3, 6, 11)
[7] LUIS ANGEL GARCIA ROSA,
a/k/a, "Dominos Amigos,"
(Counts 3, 7, 13)
[8] ANDREA JIMENEZ DE JESUS,
(Counts 3, 8, 14)
Defendants.

INDICTMENT

CRIMINAL NO.
16- 98 (PAD)

VIOLATIONS:

Count 1:
18 U.S.C. § 666(a)(1)(B)
Count 2:
18 U.S.C. § 371
Count 3:
18 U.S.C. §§ 1347, 1349
Counts 4-8:
18 U.S.C. § 1341
Counts 9-14:
18 U.S.C. § 1028A(a)(1)

FORFEITURE:

18 U.S.C. § 982
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c).

FOURTEEN COUNTS

THE GRAND JURY CHARGES:

Introduction

At all times material to this Indictment:

The Medicaid Program in the Commonwealth of Puerto Rico

1. The Medicaid Program ("Medicaid") was a federal health benefit program intended to provide benefits to low-income individuals and families. Medicaid was monitored and funded by the United States Department of Health and Human Services ("HHS") through its agency, the Centers for Medicare and Medicaid Services ("CMS").

2. In the Commonwealth of Puerto Rico, Medicaid was referred to in Spanish as “*Mi Salud*,” or “*Plan de Salud del Gobierno*” (PSG). *Mi Salud* beneficiaries included Medicaid participants and “state only funded health care recipients,” commonly referred to as “Commonwealth participants.” Whether an individual was eligible for Medicaid or Commonwealth health care benefits depended on certain eligibility requirements.

3. Although Medicaid was federally-funded, it was administered by the states and/or United States territories, including the Commonwealth of Puerto Rico. The Puerto Rico Department of Health (“PR-DOH”) was the designated single-state agency responsible for Medicaid and the Commonwealth health care plan in the Commonwealth of Puerto Rico. HHS provided the PR-DOH approximately \$1 billion annually to fund and/or reimburse the costs of Medicaid.

4. Within the PR-DOH, the Office of the Medicaid Program, also known in Spanish as “*Programa De Asistencia Medica*,” or “*Programa De Medicaid*,” was responsible for handling applications for Medicaid as well as the Commonwealth health plan eligibility, certification and recertification process.

5. Medicaid and the Commonwealth health plan eligibility was determined by a Program Technician, a government employee from the Programa de Asistencia Medica, during a personal interview with the applicant. The Program Technician was responsible for reviewing and certifying that the proof of income and available resources provided by the applicant met the requirements for enrollment into the program.

6. In order for a person to be eligible to receive *Mi Salud* benefits, the applicant must have a Social Security Number, be a United States citizen, a legal resident alien, or a permanent resident of Puerto Rico, and meet the income and resources tests for the applicable household size.

7. The Program Technician entered the *Mi Salud* applicants’ individually identifiable information as well as the eligibility calculations performed during the applicant’s interview in the

Programa de Asistencia Medica's database, also known as the Medicaid Integrated Technology Initiative ("MEDITI") database.

8. The Program Technician was responsible for creating a hard-copy file containing the applicant's individually identifiable information and the required supporting documents provided during the eligibility interview. The hard copy file was required to be stored in the office where the benefits were approved.

9. The individually identifiable information for Mi Salud participants' declared eligibility was transferred daily to the Puerto Rico Health Insurance Administration, known in Spanish as "*Adminstracion de Seguros de Salud de Puerto Rico*" ("ASES"), in order to complete the enrollment process with the various contracted "Managed Care Organizations" ("MCO"). The contracted MCOs received the eligible Mi Salud participants' information from ASES and subsequently mailed the health care insurance card to the eligible participant to their reported mailing address using the United States Postal Service.

10. ASES was responsible for contracting MCOs that provided health care coverage to all eligible Mi Salud participants. ASES paid monthly premiums to the contracted plans for purposes of providing health care benefits to Mi Salud and/or PSG participants. Monthly premiums were paid to MCOs regardless of whether or not the participant required health care services. MCOs also received federal monies for any utilization of the health care plan.

11. Triple-S, Molina Healthcare, MMM Multihealth LLC, First Medical Health Plan Inc. were contracted MCOs to service the Mi Salud and/or PSG patient population.

12. Medicaid, Mi Salud, and/or PSG, Triple-S, Molina Healthcare, MMM Multihealth LLC, First Medical Health Plan Inc. were health care benefit programs as defined by Title 18, United States Code, Section 24(b).

COUNT ONE

**Receipt of a Bribe by an Agent of an Organization Receiving Federal Funds
(Title 18, United States Code, Section 666(a)(1)(B))**

All introductory allegations are realleged and incorporated by reference as though fully set forth herein.

1. At all times material to this indictment, The Puerto Rico Department of Health, Office of the Medicaid Program, known in Spanish as “*Programa De Asistencia Medica*,” or “*Programa De Medicaid*,” was a Commonwealth of Puerto Rico government agency that received federal assistance in excess of \$10,000 during the one-year period beginning April 1, 2015, and ending December 31, 2015.

2. Defendant [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” was an agent of Programa De Asistencia Medica whose duties included serving as a clerk in the Santurce office. Defendant was an administrator who dealt with Mi Salud participant files and individual applicants that sought Mi Salud benefits.

3. Defendant [2] KAREN CURET NIEVES was an agent of Programa De Asistencia Medica whose duties included serving as a program technician in the Santurce office. Defendant evaluated and determined eligibility of Mi Salud applicants, input data in the MEDITI system, and approved Mi Salud benefits for participants.

4. Defendant [3] ORLANDO NEGRON BONILLA was an agent of Programa De Asistencia Medica whose duties included serving as a program technician in the Santurce office. Defendant evaluated and determined eligibility of Mi Salud applicants, input data in the MEDITI system, and approved Mi Salud benefits for participants.

5. From on or about July 9, 2014, through on or about October 10, 2015, in the District of Puerto Rico and within the jurisdiction of this Court, defendants

**[1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,”
[2] KAREN CURET NIEVES,**

Indictment, United States of America v. Luis Gonzalez Cordova, et. al.

[3] ORLANDO NEGRON BONILLA,

aiding and abetting one another, did corruptly solicit, demand, accept and agree to accept a thing of value from a person, to wit, cash payments, intending to be influenced and rewarded in connection with a transaction and series of transactions of Programa De Asistencia Medica involving \$5,000 or more. All in violation of Title 18, United States Code, Sections 666(a)(1)(B), 2(a), and 2(b).

COUNT TWO
Conspiracy to Commit an Offense against the United States
(Title 18, United States Code, Section 371)

All preceding allegations are realleged and incorporated by reference as though fully set forth herein.

From on or about July 9, 2014, through on or about October 10, 2015, in the District of Puerto Rico and within the jurisdiction of this Court, defendants

[1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,”
[2] KAREN CURET NIEVES,
[3] ORLANDO NEGRON BONILLA,

knowingly and willfully conspired and agreed to commit an offense against the United States, that is: the Receipt of a Bribe by an Agent of an Organization Receiving Federal Funds, in violation of Title 18, United States Code, Section 666(a)(1)(B) as set forth in Count One.

Purpose & Object of the Conspiracy

It was the purpose and object of the conspiracy for the defendants to corruptly solicit, demand, accept and agree to cash payments intending to be influenced and rewarded in connection with a transaction and series of transactions of Programa De Asistencia Medica involving \$5,000 or more while the Commonwealth of Puerto Rico government agency received federal assistance in excess of \$10,000 during the one-year period beginning April 1, 2015, and ending December 31, 2015.

Manner & Means of the Conspiracy

During the course of the conspiracy, defendants used runners to recruit ineligible participants for enrollment in the Mi Salud program. Defendants accomplished these means in furtherance of the conspiracy using telephone calls, texts, in-person meetings, and false computer entries into the MEDITI database in exchange for cash payments.

Overt Acts

In furtherance of the conspiracy and to achieve its objects, defendants performed the following overt acts, among others:

1. On or about September 20, 2015, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," received a cash bribe of \$40.00 from a confidential informant in order to facilitate the fraudulent enrollment of AGV into the Mi Salud program.
2. On or about September 21, 2015, [2] KAREN CURET NIEVES fraudulently certified AGV into the Mi Salud program.
3. On or about October 2, 2014, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," received a cash bribe of \$50.00 from a prospective participant, HGH, in order to facilitate the fraudulent enrollment of HGH into the Mi Salud program.
4. On or about October 2, 2014, [3] ORLANDO NEGRON BONILLA fraudulently certified HGH into the Mi Salud program.
5. On or about September 29, 2015, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," texted [2] KAREN CURET NIEVES the name and date of birth of MAML, for purposes of fraudulent enrollment into the Mi Salud program.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE
Conspiracy to Commit Health Care Fraud
(Title 18, United States Code, Sections 1347 and 1349)

All preceding allegations are realleged and incorporated by reference as though fully set forth herein.

From on or about July 9, 2014, and continuing through on or about December 31, 2015, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi,"
[2] KAREN CURET NIEVES,
[3] ORLANDO NEGRON BONILLA,
[4] RUBEN ESCALERA RIVERA,
[5] PERFECTO DE LEON TORIBIO,
[6] LUIS CACERES DE LEON, a/k/a, "Ito Bohito,"
[7] LUIS ANGEL GARCIA ROSA, a/k/a, "Dominos Amigos,"
[8] ANDREA JIMENEZ DE JESUS,

the defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully conspire and agree to execute a scheme and artifice to defraud Medicaid, Mi Salud, PSG, Triple-S, Molina Healthcare, MMM Multihealth LLC, and First Medical Health Plan Inc., health care benefit programs, as defined in Title 18, United States Code, Section 24(b), by means of materially false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of the health care benefit programs, in connection with the delivery of and payment for health care benefits, items, and services in violation of Title 18, United States Code, Sections 1347 and 1349.

The Conspiracy, Its Objects And Schemes

1. The object of the conspiracy and the scheme and artifice to defraud was for the defendants to unlawfully enrich themselves by accepting cash bribes and payments in exchange for causing otherwise ineligible participants to be certified into health care benefit programs.

2. During the course of the conspiracy, telephone calls, texts, and false computer entries into the MEDITI were either made, or caused to be made, by the defendants in furtherance of the *Indictment, United States of America v. Luis Gonzalez Cordova, et. al.*

conspiracy and scheme to defraud. Defendants accomplished these means by using false and fraudulent pretenses and representations.

Mi Salud Employees

1. Defendant [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” was a clerk in the “Programa De Asistencia Medica” Santurce office who dealt with Mi Salud participant files and individual applicants that sought Mi Salud benefits.
2. Defendants [2] KAREN CURET NIEVES and [3] ORLANDO NEGRON BONILLA were Program Technicians at the Programa De Asistencia Medica Santurce office who evaluated and determined eligibility of Mi Salud applicants, input data in the MEDITI system, and approved Mi Salud benefits for otherwise ineligible participants on the instructions of [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” and in exchange for cash payments.
3. Defendant [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” did not exercise any supervisory authority over defendants [2] KAREN CURET NIEVES and [3] ORLANDO NEGRON BONILLA.

Runners

During the course of the conspiracy, runners, specifically and collectively, [4] RUBEN ESCALERA RIVERA, [5] PERFECTO DE LEON TORIBIO, [6] LUIS CACERES DE LEON, a/k/a, “Ito Bohito,” [7] LUIS ANGEL GARCIA ROSA, a/k/a, “Dominos Amigos,” and [8] ANDREA JIMENEZ DE JESUS, solicited and referred individuals to LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” for their fraudulent entry into health care benefit programs.

Manner and Means of the Conspiracy

The manner and means by which the defendants sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

1. Defendants [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” and [3] ORLANDO NEGRON BONILLA used runners to recruit individuals to be fraudulently enrolled into the health care benefits programs in exchange for cash bribes.
2. Certain runners were provided with cash payments in exchange for the referral.
3. Runners called [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi” by telephone for purposes of fraudulently enrolling individuals into health care benefit programs.
4. Runners texted the names, Social Security numbers, birth dates, and residential addresses to [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” for purposes of fraudulently enrolling individuals into health care benefit programs.
5. Runners called and personally met with individuals for purposes of fraudulently enrolling individuals into health care benefit programs.
6. In order to avoid detection of the scheme, defendants would not meet with prospective participants at the Santurce office.
7. Runners solicited and collected cash payments from individuals to be used as bribes for purposes of fraudulently enrolling individuals into health care benefit programs.
8. Runners delivered cash bribes to [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi” for purposes of fraudulently enrolling individuals into health care benefit programs.
9. Upon receiving the personal identification information from the runners, [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” provided it to either [2] KAREN CURET NIEVES or [3] ORLANDO NEGRON BONILLA by text or handwritten note for entry into the MEDITI database to create the health care benefits.
10. In order to avoid detection of the scheme, [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,” [2] KAREN CURET NIEVES, and [3] ORLANDO NEGRON BONILLA did not create a physical file for the fraudulent participant.

11. [2] KAREN CURET NIEVES and [3] ORLANDO NEGRON BONILLA certified individuals into the Mi Salud program in exchange for cash bribes or kickbacks without personally meeting with the individuals to determine their eligibility as required by PR-DOH procedures.
12. The false entries made by [2] KAREN CURET NIEVES and [3] ORLANDO NEGRON BONILLA into the MEDITI database were transmitted to ASES.
13. ASES forwarded the applicant's entry to the MCO for the issuance of the applicant's health care insurance card.
14. The health care insurance card from the particular MCO was sent by the United States Postal Service to the applicant using the address provided by [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," to [2] KAREN CURET NIEVES or [3] ORLANDO NEGRON BONILLA.
15. [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi" used intermediaries to hand-deliver the Form MA-10, Certification of Eligibility Approval, to participants in order to minimize having direct contact with them.
16. [2] KAREN CURET NIEVES approved twenty to thirty unqualified individuals per week into the Mi Salud program for a fee of \$10.00 each.
17. [3] ORLANDO NEGRON BONILLA approved up to five unqualified individuals per week into the Mi Salud program for fees ranging from \$10.00 to \$30.00 each.
18. [3] ORLANDO NEGRON BONILLA certified individuals into the Mi Salud program that were otherwise ineligible for health care benefits because they were not a United States citizen, a legal resident alien, or a permanent resident of Puerto Rico.
19. [3] ORLANDO NEGRON BONILLA used his own runner and personally met at the runner's residence on multiple occasions to collect cash bribes in exchange for the fraudulent enrollment of numerous individuals for Mi Salud benefits.
20. [2] KAREN CURET NIEVES approved an individual for health care benefits that was a

fugitive from justice and otherwise ineligible for health care benefits.

21. Defendants fraudulently and routinely understated participants' income amount and financial resources for the applicable household size in order to make it appear as if the participant qualified for Mi Salud benefits.

Acts In Furtherance Of The Conspiracy

In furtherance of the conspiracy and to achieve its objects, defendants performed the following overt acts, among others:

1. On or about September 20, 2015, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," received a cash bribe of \$40.00 from a confidential informant in order to facilitate the fraudulent enrollment of AGV into the Mi Salud program.
2. On or about September 21, 2015, [2] KAREN CURET NIEVES fraudulently certified AGV into the Mi Salud program.
3. On or about October 2, 2014, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," received a cash bribe of \$50.00 from a prospective participant, HGH, in order to facilitate the fraudulent enrollment of HGH into the Mi Salud program.
4. On or about October 2, 2014, [3] ORLANDO NEGRON BONILLA fraudulently certified HGH into the Mi Salud program.
5. On or about September 29, 2015, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," texted the name and date of birth of MAML, a fraudulent applicant, to [2] KAREN CURET NIEVES for purposes of enrollment into the Mi Salud program.
6. On or about September 21, 2015, [3] ORLANDO NEGRON BONILLA fraudulently certified PVG into the Mi Salud program.
7. On or about September 30, 2015, [2] KAREN CURET NIEVES fraudulently certified MML into the Mi Salud program.

8. On or about August 11, 2015, [4] RUBEN ESCALERA RIVERA received the name, address, Social Security number, and birth date of MFM in order to fraudulently enroll MFM into the Mi Salud program.
9. On or about August 19, 2015, [4] RUBEN ESCALERA RIVERA received a \$100.00 cash payment for the fraudulent enrollment of MFM into the Mi Salud program.
10. On or about August 24, 2015, [2] KAREN CURET NIEVES fraudulently certified MFM into the Mi Salud program.
11. On or about October 1, 2015, [5] PERFECTO DE LEON TORIBIO texted the name, address, Social Security number, and birth date of WRG to [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," in order to fraudulently enroll WRG into the Mi Salud program.
12. On or about October 1, 2015, [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," texted the name, address, Social Security number, and birth date of WRG to [2] KAREN CURET NIEVES in order to fraudulently enroll WRG into the Mi Salud program.
13. On October 2, 2015, [2] KAREN CURET NIEVES fraudulently certified WRG into the Mi Salud program.
14. On or about August 25, 2015, [5] PERFECTO DE LEON TORIBIO met [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," in Santurce, Puerto Rico, in order to provide him with \$40.00 in cash in order to fraudulently certify himself into the Mi Salud program.
15. On September 29, 2015, [6] LUIS CACERES DE LEON, a/k/a, "Ito Bohito," received a \$75.00 payment via ATH mobile from JOR in order for [6] LUIS CACERES DE LEON, a/k/a, "Ito Bohito" to facilitate JOR's fraudulent enrollment into the Mi Salud program.
16. On or about October 6, 2015, [6] LUIS CACERES DE LEON, a/k/a, "Ito Bohito," texted the name, Social Security number, and birth date of JOR to [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," in order to fraudulently enroll JOR into the Mi Salud program.

17. On or about September 21, 2015, [6] LUIS CACERES DE LEON, a/k/a, "Ito Bohito," received \$75.00 in cash from SEGV to facilitate her minor son, PVG's, fraudulent enrollment into the Mi Salud program.

18. On or about November 20, 2015, [6] LUIS CACERES DE LEON, a/k/a, "Ito Bohito," discussed the fraudulent enrollment scheme for Mi Salud benefits with SEGV.

19. On or about September 29, 2015, [7] LUIS ANGEL GARCIA ROSA, a/k/a, "Dominos Amigos," texted the name and birth date of MAL to [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," in order to fraudulently enroll MAL into the Mi Salud program.

20. On or about September 29, 2015, [7] LUIS ANGEL GARCIA ROSA, a/k/a, "Dominos Amigos," received a cash payment of \$80.00 in order to fraudulently enroll MAL into the Mi Salud program. [7] LUIS ANGEL GARCIA ROSA, a/k/a, "Dominos Amigos," provided \$40.00 to [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," in order to fraudulently certify MAL into the Mi Salud program and shared the remaining \$40.00 with another individual.

21. On or about October 5, 2015, [8] ANDREA JIMENEZ DE JESUS received a cash payment of \$60.00 in order to fraudulently enroll CVA into the Mi Salud program.

22. On or about October 5, 2015, [8] ANDREA JIMENEZ DE JESUS texted the name, birth date, and Social Security number of CVA to [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," in order to fraudulently enroll CVA into the Mi Salud program.

23. On or about October 5, 2015, [8] ANDREA JIMENEZ DE JESUS met with [1] LUIS GONZALEZ CORDOVA, a/k/a "Luigi," and provided him with a cash payment in order to fraudulently certify CVA into the Mi Salud program.

All in violation of Title 18, United States Code, Sections 1347 and 1349.

COUNTS FOUR through EIGHT
Mail Fraud
(Title 18, United States Code, Sections 1341, 2(a), and 2(b))

All preceding allegations are realleged and incorporated by reference as though fully set forth herein.

The object of the scheme and artifice to defraud was for the defendants to unlawfully enrich themselves by accepting cash bribes and money in exchange for the certification of ineligible individuals into health care benefit programs.

During the course of the scheme, texts, telephone calls, and false computer entries into the MEDITI database were either made, or caused to be made, by the defendants in furtherance of the scheme to defraud using false and fraudulent pretenses and representations. The Medicaid benefits cards were sent to ineligible individuals using the United States Postal Service.

From on or about July 9, 2014, and continuing through on or about October 10, 2015, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] **LUIS GONZALEZ CORDOVA, a/k/a “Luigi,”**
[2] **KAREN CURET NIEVES,**
[4] **RUBEN ESCALERA RIVERA,**
[5] **PERFECTO DE LEON TORIBIO,**
[6] **LUIS CACERES DE LEON, a/k/a, “Ito Bohito,”**
[7] **LUIS ANGEL GARCIA ROSA, a/k/a, “Dominos Amigos,”**
[8] **ANDREA JIMENEZ DE JESUS,**

the defendants herein, aiding and abetting each other, with the intent to defraud, devised and executed the above-described scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises knowingly caused to be placed in an authorized depository for mail, to be sent and delivered by the United States Postal Service the following matters:

COUNT	DEFENDANTS	DESCRIPTION OF TIME CAUSED TO BE MAILED	MAILED TO
4	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [4] RUBEN ESCALERA RIVERA	Envelope containing Medicaid benefits card with MMM Multihealth LLC for individual with initials MFM on or about August 24, 2015	PO Box 1882 Carolina, PR 00984
5	[2] KAREN CURET NIEVES, and [5] PERFECTO DE LEON TORIBIO	Envelope containing Medicaid benefits card with First Medical Health Plan Inc. for [5] PERFECTO DE LEON TORIBIO on or about April 1, 2015	2082 Gilberto Monroig Villa Palmeras San Juan, PR 00915
6	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [6] LUIS CACERES DE LEON	Envelope containing Medicaid benefits card with First Medical Health Plan Inc. for individual with initials JOR on or about October 7, 2015	AX14 C Monterrey Urb. Venus Gardens San Juan, PR 00926
7	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [7] LUIS ANGEL GARCIA ROSA	Envelope containing Medicaid benefits card with First Medical Health Plan Inc. for individual with initials MAML on or about September 30, 2015	Calle 3 E-12 Urb. Terrazas de Cupey Trujillo Alto, PR 00976
8	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [8] ANDREA JIMENEZ DE JESUS	Envelope containing Medicaid benefits card with First Medical Health Plan Inc. for individual with initials CVA on or about October 5, 2015	PO Box 30249 San Juan, PR 00929

Each Count a separate and distinct violation of Title 18, United States Code, Section 1341, and Sections 2(a) and 2(b).

COUNTS NINE through FOURTEEN
Aggravated Identity Theft
(Title 18, United States Code, Sections 1028A(a)(1), 2(a), and 2(b))

All preceding allegations are realleged and incorporated by reference as though fully set forth herein.

On or about each of the dates listed below, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

- [1] LUIS GONZALEZ CORDOVA, a/k/a “Luigi,”
- [2] KAREN CURET NIEVES,
- [3] ORLANDO NEGRON BONILLA,
- [4] RUBEN ESCALERA RIVERA,
- [5] PERFECTO DE LEON TORIBIO,
- [6] LUIS CACERES DE LEON, a/k/a, “Ito Bohito,”
- [7] LUIS ANGEL GARCIA ROSA, a/k/a, “Dominos Amigos,”
- [8] ANDREA JIMENEZ DE JESUS,

the defendants herein, aided and abetted by others, did willfully and knowingly cause the transfer, possession, and use, without lawful authority, a means of identification of another person, to wit: the name, Social Security number (“SSN”), and birth date (“DOB”) of a real person, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: the conspiracy to commit health care fraud under Title 18, United States Code, Sections 1347 and 1349 as charged in Count Three and mail fraud under Title 18, United States Code, 1341 as charged in Counts Four through Eight, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Sections 1028A(a)(1), 2(a), and 2(b).

COUNT	DEFENDANTS	DATE/DESCRIPTION	MEANS OF IDENTIFICATION
9	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [4] RUBEN ESCALERA RIVERA	On or about August 24, 2015, paper containing the name, SSN, and DOB of an actual individual with initials MFM	Name, SSN, and DOB of an actual individual with initials MFM.
10	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [5] PERFECTO DE LEON TORIBIO	On or about October 1, 2015, text messages from [5] PERFECTO DE LEON TORIBIO to [1] LUIS GONZALEZ CORDOVA and from [1] LUIS GONZALEZ CORDOVA to [2] KAREN CURET NIEVES containing the name, SSN, and DOB of an actual individual with initials	Name, SSN, and DOB of an actual individual with initials WRG

		WRG	
11	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [6] LUIS CACERES DE LEON	On or about October 6, 2015, text messages from [6] LUIS CACERES DE LEON to [1] LUIS GONZALEZ CORDOVA and from [1] LUIS GONZALEZ CORDOVA to [2] KAREN CURET NIEVES containing the name, SSN, and DOB of an actual individual with initials JOR	Name, SSN, and DOB of an actual individual with initials JOR
12	[3] ORLANDO NEGRON BONILLA	On or about September 21, 2015, defendant entered into the MEDITI database the name, birth date, and SSN of PVG	Name of an actual individual with initials PVG
13	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [7] LUIS ANGEL GARCIA ROSA	On or about September 29, 2015, text messages from [7] LUIS ANGEL GARCIA ROSA to [1] LUIS GONZALEZ CORDOVA and from [1] LUIS GONZALEZ CORDOVA to [2] KAREN CURET NIEVES containing the name of an actual individual with initials MML	Name of an actual individual with initials MML
14	[1] LUIS GONZALEZ CORDOVA, [2] KAREN CURET NIEVES, and [8] ANDREA JIMENEZ DE JESUS	On or about October 5, 2015, text messages from [8] ANDREA JIMENEZ DE JESUS ROSA to [1] LUIS GONZALEZ CORDOVA and from [1] LUIS GONZALEZ CORDOVA to [2] KAREN CURET NIEVES containing the name, SSN, and DOB of an actual individual with initials CVA	Name, SSN, and DOB of an actual individual with initials CVA

Each Count a separate and distinct violation of Title 18, United States Code, Sections 1028A(a)(1), 2(a), and 2(b).

FORFEITURE
(Title 18, United States Code, Section 982)

1. All of the allegations contained above are realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982.

2. Upon conviction of a violation of Title 18, United States Code, Section 666, as alleged in Count One of this Indictment, Title 18, United States Code, Section 371, as alleged in Count Two of this Indictment, Title 18, United States Code, Section 1347 and 1349, as alleged in Count Three of this Indictment, Title 18, United States Code, Section 1341, as alleged in Counts Four through Eight, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

3. The property to be forfeited includes, but is not limited to, the following:

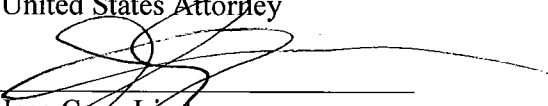
a. A forfeiture money judgment of approximately \$50,000.00.

4. If any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

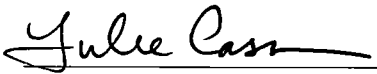
All pursuant to 18 U.S.C. § 982(a)(7) and 28 U.S.C. § 2461(c).

TDIE DII I

ROSA EMILIA RODRÍGUEZ-VÉLEZ
United States Attorney



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Assistant United States Attorney
Chief, Criminal Division



Luke Cass
Assistant United States Attorney



Seth A. Erbe
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